

UNITED STATES DISTRICT COURT  
WESTERN DISTRICT OF NEW YORK

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SOLICITY MANLEY

Case No.: 20-cv-00551

Plaintiff,

vs.

DIVERSIFIED RECOVERY BUREAU, LLC

Defendant.

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**DECLARATION OF SCOTT RYAN**

1. I am the Director of Operations at Defendant Diversified Recovery Bureau, LLC (“Defendant”) and as such, I have knowledge of the business practices and procedures of Defendant.

2. I submit this Declaration in support of Defendant’s motion to dismiss and compel arbitration.

3. Plaintiff Solicity Manley (“Plaintiff”) and non-party Purchasing Power entered into an agreement dated March 29, 2018 (the “Agreement”). Plaintiff duly executed the Agreement by electronic signature.

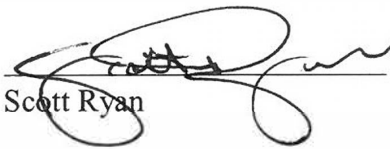
4. Thereafter Purchasing Power sold Plaintiff’s account to Plaza Services, LLC who was assigned all of Purchasing Power’s rights under the Agreement.

5. Plaza Services, LLC placed Plaintiff’s account with Defendant for servicing. In its role as servicer, Defendant received and kept the Agreement in the regular course of its business. A true and accurate copy of the Agreement is attached as **Exhibit A**.

6. After the placement of Plaintiff’s account, Defendant began servicing same.

7. I declare under the penalty of perjury that the foregoing is true and correct.

Dated: October 20, 2020



Scott Ryan